

### REMARKS

Claims 14-25, 27 and 29-31 are pending in the application and have been rejected. For at least the following reasons, applicants submit that all claims are now in allowable form. Applicants respectfully request the Examiner to enter the claim amendments and to withdraw all rejections.

#### Claim Amendments

Independent claims 14 and 30 have been amended to include the limitation "after depositing said precipitation agent." This limitation is supported by the specification. (11:3-5; 17:11-14). All other currently pending claims depend from claims 14 and 30. Applicants request the Examiner to enter these amendments.

#### Rejections Under 35 U.S.C. §102(b) and §102(e)

Claims 14, 16-20, and 29 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Takano et al., (US 2003/0176005). Also, claims 14, 16-23, and 27 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Seki et al., (US 2004/0144975).

Takano fails to teach the limitations of currently amended claim 14 in at least two ways.

First, Takano fails to teach a precipitation agent as recited in claim 14. Takano does teach "a composition obtained by dissolving a mixture of a polythiophene derivative ... in a polar solvent" [0124]. Takana also teaches that the polymer material is deposited as the solvent dries: "the first composition ejected is subjected to drying and heating treatments for evaporating the polar solvent" [0126].

The Examiner asserts that Takano's "polar solvent" is a "precipitating agent." However, Takano's solvent is clearly not a "precipitating agent." As stated in Takano, the polar solvent *dissolves* the polymer material. The term "dissolve" means "1. [t]o cause to disperse; 2. [t]o cause to pass into solution" (McGraw-Hill Dictionary of Scientific and Technical Terms, Sybil P. Parker, ed., 5th ed., 1994). In contrast, the term "precipitation" means "[t]he process of producing a separable solid phase within a liquid medium" *Id.*. A "precipitating agent" then

means an agent that causes precipitation. This is consistent with the application, which discloses that “the precipitation agent causes the particles of the drop to become larger in size and coalesce” (page 10, lines 8-9). It will be understood by those of ordinary skill in the art that dissolving a material is completely different from producing a separable solid phase. Thus, Takano’s polar solvent is not a precipitation agent.

Although the Examiner is entitled to a reasonably broad interpretation of the claim terms, the Examiner cannot select an interpretation that is contrary to the accepted meaning of a term by those of ordinary skill in the art. “The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach,” MPEP §2111, citing *In re Cortright*, 165 F.3d 1353, 1359, 49 USPQ2d 1464, 1468 (Fed. Cir. 1999). For the Examiner to assert that Tanaka’s “solvent,” which causes the polymer material to dissolve, constitutes a “precipitating agent” is simply inconsistent with the interpretation that those skilled in the art would reach.

Second, Tanako fails to teach depositing an organic material upon a precipitation agent *after depositing the precipitation agent*. Takano describes depositing a composition that is a *mixture* of an organic material with a polar solvent: “the ejected droplets 510c of the first composition [*i.e.* the mixture] spread over the electrode surface ....” [0125]. Thus, in Tanako, the mixture of organic material and polar solvent is spread on the electrode surface at the same time. Takano does not, therefore, teach the limitation in claim 14 as currently amended of depositing of an organic material upon a precipitation agent *after* depositing the precipitation agent.

Seki fails to teach the limitations of currently amended claim 14 for the same reasons. Seki teaches that “[t]he solvent forms the composition ... by mixing with the organic conductive or semiconductive material.” [0084]. “The organic conductive material ... can be dissolved or dispersed in the solvent ....” [0103]. Seki also teaches that the manufacturing method includes applying the composition [*i.e.* the mixture] to the substrate. [0111-0112]. Thus, Seki teaches both that the organic material *dissolves* in the solvent, and that it is this *mixture* that is deposited on the substrate. Seki does not, therefore, teach the limitations of claim 14.

For at least these reasons, applicants submit that claims 14, 16-23, 27, and 29 are in allowable form, and request that the Examiner withdraw these rejections.

#### Rejections Under 35 U.S.C. §103

Claims 15 and 25 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Seki in view of Sellinger (US 6,861,091). Also, claim 24 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Seki in view of Mueller et al. (US 6,316,786). Finally, claims 30 and 31 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Takano et al.

As described above, claims 14 and 30 have been amended to include the limitation “after depositing said precipitation agent.” As stated above, neither Takano nor Seki teach or suggest this limitation. Rather, these references teach away from this limitation. Sellinger and Mueller also do not teach or suggest this limitation. As such, there is no *prima facie* case for obviousness to the claims as currently amended. For at least this reason, applicants submit that claims 15, 24, 25, 30 and 31 are in allowable form, and request that the Examiner withdraw these rejections.

#### Objections to Drawings

The current office action indicates that drawings are objected to. Drawing were first objected to in an office action of July 7, 2006. New drawings were submitted in a response received November 7, 2006. Please ensure these drawings are now in acceptable form.

#### Previously Filed IDS

An Information Disclosure Statement was filed on August 4, 2006. Please consider and initial these references, if in acceptable form.

#### Conclusion

For at least the reasons set forth above, applicants submit that the claims of this application are in allowable form. Applicants respectfully request entry of the amendments to

claims 14 and 30, reconsideration and withdrawal of the Examiner's rejections, and allowance of this application at an early date.

To the extent necessary, a one-month petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge \$120 for the one-month extension of time fee and any shortage in fees due in connection with the filing of this paper to Deposit Account 06-1050 and please credit any excess fees to such deposit account.

Respectfully submitted,

Date: 6/1/07

  
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